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*Attorneys for Defendant
US WorldMeds LLC*

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

UNITED STATES OF AMERICA, the States of
ARKANSAS, CALIFORNIA, COLORADO,
CONNECTICUT, DELAWARE, FLORIDA,
GEORGIA, HAWAII, IOWA, ILLINOIS,
INDIANA, LOUISIANA, MARYLAND,
MASSACHUSETTS, MICHIGAN,
MINNESOTA, MONTANA, NEVADA, NEW
HAMPSHIRE, NEW JERSEY, NEW MEXICO,
NEW YORK, NORTH CAROLINA,
OKLAHOMA, RHODE ISLAND,
TENNESSEE, TEXAS, VERMONT,
VIRGINIA, WASHINGTON, and the
DISTRICT OF COLUMBIA, *ex rel.* THOMAS
ALAND,

Plaintiffs,

v.

US WORLDMEDS LLC,

Defendant.

CASE NO. 2:19-cv-02618-TLN-KJN

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO THE
COMPLAINT AND FOR BRIEFING
SCHEDULE**

Judge: Hon. Troy L. Nunley

Trial Date: None set

Action Filed: December 27, 2019

WHEREAS, on December 27, 2019, Relator Thomas Aland ("Relator") brought suit in this Court against Defendant US WorldMeds LLC ("USWM") by filing a Complaint on behalf of the United States of America as well as multiple states;

WHEREAS, the United States of America declined to intervene in this action on December 1, 2022, and the various states declined to intervene in this action on December 2, 2022;

WHEREAS, the Complaint was unsealed on December 5, 2022, and Relator served USWM with the Complaint on March 6, 2023;

WHEREAS, USWM currently intends to respond to the Complaint with a motion to dismiss pursuant to Federal Rule of Civil Procedure 12;

WHEREAS, the parties wish to stipulate to an extension of time for USWM to respond to the Complaint, and to set a briefing schedule for USWM's motion to dismiss; and

WHEREAS, no party has previously sought any extension of time in this action;

NOW, THEREFORE, under Local Rules 143 and 144, the parties stipulate to the following briefing schedule on the USWM's forthcoming motion to dismiss, subject to approval of the Court:

- May 5, 2023: Deadline for the USWM to file its motion to dismiss (or to answer the Complaint, should it choose to do that);
- June 5, 2023: Deadline for Relator to file its opposition to any motion to dismiss;
- June 20, 2023: Deadline for USWM to file any reply brief in support of any motion to dismiss;
- Hearing on any motion to dismiss filed by USWM on August 17, 2023 at 2:00 p.m., or the next available hearing date convenient for the Court.

Dated: March 15, 2023

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Benjamin Wagner

Benjamin Wagner

*Attorneys for Defendant
US WorldMeds LLC*

Dated: March 15, 2023

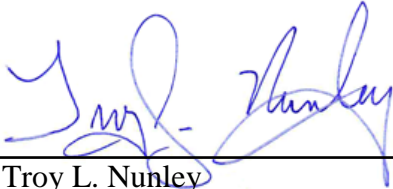
By: /s/ Richard M. Elias (as authorized on March 15, 2023)

Richard M. Elias
James D. Weakley

*Attorneys for Relator
Thomas Aland*

IT IS SO ORDERED.

Dated: March 15, 2023



Troy L. Nunley
United States District Judge